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March 14, 2014

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

- - - - - x
JUNIOR WALKER and TAHERA BULLEN-WALKER, on behalf
of themselves and on behalf of their infant
children T.W. and N.W.,
Plaintiffs,

Index No.
12-CV-2535 (WFR) (MDG)

-against-

THE CITY OF NEW YORK, STACEY ROBINSON, Caseworker,
New York City Administration of Children's
Services, in the individual and the official
capacities, GLADYS WHITE, Supervisor, New York
City Administration of Children Services, in her
individual and official capacities, JACQUELINE
MCKNIGHT, Assistant Commissioner-Brooklyn,
New York City Administration of Children Services
in her individual and official capacities, SHARON
ROGERS, Deputy Director for Brooklyn Field Office,
Zone E, New York City Administration of Children
Services in her individual and official capacities
BURTON LEWIS, Supervisor, New York City
Administration of Children's Services, in his
individual and official capacities, KAREN
SAWYER-BARRO, Supervisor, New York City
Administration of Children's Services in her
individual and official capacities, NATARSKY
LOUISSAINT, Caseworker, New York City
Administration of Children Services in her
individual and official capacities and JOHN
MATTINGLY, former Commissioner of the New York
City Administration of Children Services in his
individual and official capacities,
Defendants.

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100 Church Street
New York, New York 10007

March 14, 2014
1:14 p.m.
(Continued on next page.)

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2 EXAMINATION BEFORE TRIAL of the Defendant, KAREN
3 SAWYER-BARRO, taken by the Plaintiffs, in the
4 above-entitled action, held at the above time and
5 place, pursuant to Order, taken before Lauren
6 Mele, a shorthand reporter and Notary Public
7 within and for the State of New York.
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A p p e a r a n c e s :

KATHY POLIAS, ESQ.

Attorneys for Plaintiffs
68 Jay Street
Brooklyn, New York 11201

BY: KATHY POLIAS, ESQ.
FILE #: None

GEORGIA MCCARTHY

Attorneys for Plaintiffs
902 East 86th Street
Brooklyn, New York 11236

BY: GEORGIA MCCARTHY, ESQ.
FILE #: None

ZACHARY V. CARTER

CORPORATION COUNSEL
Attorneys for Defendants
100 Church Street, 4th Floor
New York, New York 10007

BY: CHARLES CAREY, ESQ.
FILE #: None

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F E D E R A L S T I P U L A T I O N S

IT IS HEREBY STIPULATED AND AGREED by and
between (among) counsel for the respective
parties herein, that filing and sealing be and the
same are hereby waived.

IT IS FURTHER STIPULATED AND AGREED that
all objections, except as to the form of the
question, shall be reserved to the time of the
trial.

IT IS FURTHER STIPULATED AND AGREED that
the within deposition may be sworn to and signed
before any officer authorized to administer an
Oath, with the same force and effect as if signed
and sworn to before the Court.

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K A R E N S A W Y E R - B A R R O, the witness
herein, having been first duly sworn by a Notary
Public of the State of New York, was examined and
testified as follows:

EXAMINATION BY
MS. POLIAS:

Q State your name for the record, please.

A Karen Sawyer-Barro.

Q State your business address for the
record, please.

A 1200 Waters Place, Bronx, New York 10461.

Q Good afternoon, Ms. Sawyer. My name is
Kathy Polias, and I am an attorney who represents
plaintiffs Junior Walker and Tahera Bullen-Walker
as well as their minor children in a case
currently pending in the eastern district of
New York against the City of New York and some
other employees, including yourself. With me
today is my co-counsel, Georgia McCarthy.

Today I will be asking you some questions
regarding our claims and what I understand the
defendants' defenses to be. If I ask a question
that you don't understand, please free to ask me
to rephrase it. If I am speaking too quickly or

1 KAREN SAWYER-BARRO

2 Q What other documents are sent to the
3 state?

4 A There is a rap, risk assessment profile,
5 that's due within thirty days. The rap is due.
6 That's again something you do within the context
7 of the investigation. You are clicking around the
8 rap is due.

9 At the conclusion of 60 days, if the
10 family preventative services, every six months,
11 there is another reassessment family assessment
12 service profile. There are many different ways
13 that the work is monitored, but then also that the
14 state is communicated with around what service the
15 family is getting, what the status of their
16 investigation was, you know, etc., etc.

17 Q I'm putting before you what's been marked
18 as Plaintiff's Exhibit 6 as of today.

19 A Okay.

20 Q Have you had an opportunity to review
21 that document?

22 A No.

23 Q Tell me when you finish reviewing it.

24 A Okay.

25 Q Do you recognize Plaintiff's Exhibit 6?

1 KAREN SAWYER-BARRO

2 A Yes.

3 Q When was the first time that you saw it?

4 A A few moments ago.

5 Q So today was the first time that you saw
6 Plaintiff's Exhibit 6?

7 A Yes.

8 Q Is it correct to say that you were not
9 consulted within the preparation of Plaintiff's
10 Exhibit 6?

11 A Yes. This is created F.C.L.S., the
12 attorney at family Court.

13 Q Let me direct your attention to the last
14 two pages of the exhibit.

15 Before today, have you ever seen
16 JW491-92?

17 A No.

18 Q Do you recall Stacey Robinson consulting
19 with you about any written statements that she
20 gave for the petition, the Article 10 petition?

21 A Yes. Well, I'm certain she may have said
22 something. I don't remember what she talked about
23 right before Court. I don't think so.

24 Q Did Ms. Robinson or Gladys White, during
25 the Article 10 proceeding, consult with you on any

1 KAREN SAWYER-BARRO

2 aspects of the proceeding?

3 A Yes.

4 Q What did they consult with you about?

5 A Just, you know, their desire to follow
6 through. I mean, Mrs. White was the supervisor,
7 so this was a fairly routine of her job. I
8 wouldn't have gotten in the nitty gritty. There
9 wouldn't many questions she had of me.

10 Many times the first time they go to
11 Court, they would be accompanied by the
12 supervisor, because they are new. So most likely
13 Mrs. White would have been sitting there with her.
14 While I don't remember she's calling me back and
15 saying something, I can't believe.

16 Q When you were a manager, did you play any
17 role in the proceeding?

18 A Certainly. I would support the team,
19 talk with them about it. I had an open door
20 policy. If you have any questions about how the
21 whole process works in general, not a problem.
22 Come and talk to me about it. I'm sure that I
23 supported her efforts to show Ms. Robinson how to
24 file a case, how to communicate with the
25 attorneys, etc. etc. So yes, I was there as a

1 KAREN SAWYER-BARRO

2 support, as overall. I approved what they were
3 doing. I felt it was the right approach.

4 Q Did it come to your attention at any
5 point that ACS decided not to proceed with the
6 Article 10 petition against the Aunt?

7 A I don't recall.

8 Q Did it come to your attention at any
9 point that plaintiff Junior Walker asked the
10 central registry to do a review of the case?

11 A I don't -- no, no.

12 Q I'm putting before you Plaintiff's
13 Exhibit 7, which is a nine page document.

14 A Okay.

15 Q Do you recognize this document,
16 Plaintiff's Exhibit 7?

17 A Now that I am reviewing it, I'm sure I
18 recognize it.

19 Q Have you ever seen this document before
20 today?

21 A No.

22 Q Did it ever COME to your attention that
23 the central registry found that the allegations
24 against Junior Walker were unsubstantiated?

25 A In the course of preparing for this, yes.

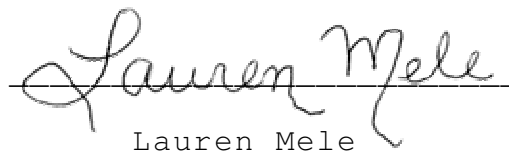
1 KAREN SAWYER-BARRO

2 C E R T I F I C A T E

3 I, Lauren Mele, a shorthand reporter and
4 Notary Public within and for the State of
5 New York, do hereby certify:

6 That the witness(es) whose testimony is
7 hereinbefore set forth was duly sworn by me, and
8 the foregoing transcript is a true record of the
9 testimony given by such witness(es).

10 I further certify that I am not related to
11 any of the parties to this action by blood or
12 marriage, and that I am in no way interested in
13 the outcome of this matter.

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16 
17 Lauren Mele